

**REMARKS**

Claims 1-30 are pending in this application. By this Amendment, claims 1-10, 12, 13, 18, 22 and 28-30 are amended. Claims 2-9 are amended to replace "moire" with "moiré," and claims 10, 12, 13, 18, 27, 28 and 30 are amended to correct antecedence. Support for amended claims 1, 22 and 29 may be found in the original specification, for example at paragraph [0102]. No new matter is added.

Reconsideration of the application is respectfully requested.

The courtesies extended to Applicant's representative by Examiner Kau and Examiner Lamb at the interview held June 13, 2007, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicant's record of the interview.

**I. Rejection Under 35 U.S.C. §103(a)**

Claims 1-30 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 4,893,195 ("Tada") in view of U.S. Patent No. 6,522,425 ("Yoshidome"), further in view of U.S. Patent No. 4,760,460 ("Shimotohno"). Applicant respectfully traverses this rejection.

None of the applied references, alone or in combination, teach or suggest a method for minimizing moiré in a halftone image formed using a halftoner, including adjusting each moiré zone in a halftoner memory to reduce a moiré intensity profile of the image, wherein the reduced moiré intensity profile is below a threshold, and thus moiré is minimized, as recited in claim 1, and similarly recited in claims 22 and 29.

**A. Tada and Yoshidome**

The Patent Office concedes that Tada fails to teach or suggest adjusting each moiré zone in a halftoner memory to reduce a moiré intensity profile of the image, and relies on Yoshidome as allegedly teaching this feature.

Yoshidome discloses a method of predicting and processing image fine structures that ensures moiré will appear on a hard or soft proof of a document in an accurate and convenient way within a short time (see col. 5, lines 44-62). Yoshidome further discloses that because the intensity of moiré varies with the specifications of each printing machine to be used, the intensity of the moiré may need to be adjusted (see column 10, lines 30-39). In contrast, the present claims require moiré to be minimized, not merely the intensity of moiré to be adjusted. Nowhere does Yoshidome teach or suggest a method for minimizing moiré in a halftone image formed using a halftoner, including adjusting each moiré zone in a halftoner memory to reduce a moiré intensity profile of the image, wherein the reduced moiré intensity profile is below a threshold, and thus moiré is minimized, as required in the present claims.

Further, there is no motivation to combine the teachings of Yoshidome with that of Tada. One of ordinary skill in the art would not have looked to combine the teachings of Yoshidome, which discloses a method that ensures moiré to be printed in an image, with the teachings of Tada, which discloses a method for eliminating moiré from an image. That is, Yoshidome is teaching away from Tada.

**B. Shimotohno**

Furthermore, Shimotohno fails to teach or suggest a method for minimizing moiré in a halftone image formed using a halftoner, including adjusting each moiré zone in a halftoner memory to reduce a moiré intensity profile of the image, wherein the reduced moiré intensity profile is below a threshold, and thus moiré is minimized, as recited in claim 1, and similarly recited in claims 22 and 29. Therefore, regardless of other alleged disclosures of Shimotohno, Shimotohno does not remedy the deficiencies of Tada and/or Yoshidome described above.

**C. Conclusion**

For at least the foregoing reasons, claims 1, 22 and 29, and dependent claims thereof, are patentable over the applied references. Thus, withdrawal of the rejection of claims 1-30 is respectfully requested.

**II. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-30 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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